Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

TIFFANY DAVIS,	§	
	§	
Plaintiff,	§	
	§	
v.	§	**Case No. 1:23-cv-131-RP**
	§	
ALOMEGA HOME HEALTH CARE,	§	
LLC AND ALVERNA MCCULLOUGH,	§	
INDIVIDUALLY,	§	
	§	
Defendants.	§	

DECLARATION OF TIFFANY DAVIS

I, Tiffany Davis, declare as follows:

1. My name is Tiffany Davis. I am over the age of eighteen years, and competent to make this declaration. I make this declaration pursuant to the provisions of 28 U.S.C. Sec.1746.

2. I make this declaration based upon personal knowledge and, if sworn as a witness, could and would testify competently to the facts contained herein.

3. I am a Licensed Vocational Nurse ("LVN) and former home health nurse of Alomega Home Health Care, LLC and Alverna McCullough ("Defendants"). I worked full time for the Defendants from approximately November 1, 2021 through October 1, 2022. During that period of time I took maternity leave on or about May 15, 2022 through approximately August 1, 2022. I then returned on or about August 2, 2022 and worked until approximately October 1, 2022.

4. Prior to taking maternity leave, I worked approximately 72-78 hours per week, and would typically work 12 hours per day, Monday through Saturday, although there were some weeks that I worked Monday through Sunday. After returning from maternity leave, I worked approximately 48 hours per week. At all times I was paid $36.00 an hour for all hours worked, whether above or below 40 hours.

5. All of my hours are reflected in the spreadsheet attached to this Declaration as Attachment 1. I derived these hours by referring to my paychecks, a true and correct copy of my which

are attached to this Declaration as Attachment 2. I was able to determine the precise number of hours that I worked each two week period (Column F of the spreadsheet) by dividing the total pay for each two week period (Column E of the spreadsheet) by my hourly rate of $36, after first accounting for any unrelated additions or deductions.

6. I then determined total number of hours worked per week by dividing the total hours reflected in Column F by 2. All hours over forty are reflected in Column H. To determine overtime that I was owed, I then multiplied all hours worked over forty (Column H) by one-half of my hourly rate, or $18 an hour.

7. As reflected in the spreadsheet, I am owed $15,179.50 in unpaid overtime compensation. Column J, Row 21 of Attachment 1.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 26, 2023.

_____
Tiffany Davis